

Proof of Claim: <CLAIM NUMBER>

Claimant: <CLAIMANT NAME>

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

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| In re: THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, <i>et al.</i> , Debtors. ¹ | PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered) |
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**SUPPLEMENT TO MOTION FOR ENTRY OF AN ORDER
AUTHORIZING ALTERNATIVE DISPUTE RESOLUTION PROCEDURES**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”), the Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”), the Puerto Rico Highways and Transportation Authority (“HTA”), and the Puerto Rico Electric Power Authority (“PREPA” and, together with the Commonwealth, ERS, and HTA, the “Debtors,” and each individually, a “Debtor”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the Debtors’ representative pursuant to Section 315(b) of

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),² respectfully submit this supplement³ to provide additional details regarding the *Motion for Entry of an Order (A) Authorizing Alternative Dispute Resolution Procedures, (B) Approving Additional Forms of Notice, (C) Approving Proposed Forms of Notice, and (D) Granting Related Relief* (the “Motion”) and respectfully state as follows:

1. On June 5, 2019, the Debtors filed the Motion on June 5, 2019, ECF No. 7224, seeking, among other relief, approval of alternative dispute resolution procedures (the “ADR Procedures”) designed to expedite the reconciliation of general unsecured claims by providing an efficient, streamlined method for resolution of certain claims, including settlement procedures and/or a truncated litigation process. The ADR Procedures further contemplate that either the Debtors or the Court may seek to transfer claims into the ADR Procedures.

2. The Motion is scheduled to be heard by the Court at the next omnibus hearing, scheduled to be held on July 24, 2019.

3. Subsequent to the filing of the Motion, and notwithstanding the express language therein, certain parties have inquired regarding the types of claims that the Debtors will identify for resolution in accordance with the ADR Procedures. In response thereto, the Debtors affirm that they do not presently intend to transfer into the ADR Procedures claims arising out of union grievances, tax refunds or employee benefits, including pension claims to the extent they are administrative in nature and related to the entitlement of quantification of benefits pursuant to existing benefit programs. However, the foregoing is without prejudice to the Debtors’ right to seek alternate relief, upon notice to all parties in interest.

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

³ For purposes of this Filing only, and because COFINA has already reconciled substantially all of its proofs of claim, COFINA is not included among the Debtors seeking relief herein.

Dated: June 21, 2019
New York, New York

Respectfully submitted,

/s/ Martin J. Bienenstock
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